

March 17, 1997

MEMORANDUM

TO: District Directors
Environmental Health Managers
Project Managers

FROM: Gary L. Hagy, Director
Division of Food and Environmental Services

SUBJECT: Migrant Labor Camp Interpretation - Laundry Trays

Attached is an interpretation of § 654.412.d, Title 20, *Code of Federal Regulations*, concerning the use of laundry trays in migrant labor camps.

This interpretation was developed by several environmental health managers whose districts have migrant labor camps. The format of the document is that which has been developed for all entries into the Division's Program Implementation Manual.

Please insert this document in your PIM manual and distribute copies to all persons in your district working in the migrant labor camp program. Please note that the PIM is effective April 1, 1997.

If you have any questions, please contact me.

Attachment

Program Implementation Manual
VDH - Division of Food and Environmental Services

PIM #97-02

Program: Migrant Labor Camps

Subject: Interpretation of E.T.A. requirements (§ 654.412.d, Title 20, *Code of Federal Regulations*) laundry trays.

Issue: How many laundry trays are required by the E.T.A. requirements in migrant labor camps?

Authority: The authority for issuing this interpretation guidelines is as follows:

Code of Virginia

1. § 32.1-211 Regulations.

Rules and Regulations of the Board of Health, Commonwealth of Virginia, Governing Migrant Labor Camps

1. § 1.02 Purpose of Regulations;
2. § 4.01 Primary Source of Standards;
3. § 4.02 Exception to Occupational Safety and Health Regulations.

Code of Federal Regulations

1. § 654.412 Bathing, laundry, and handwashing.

Public Health Rationale: Laundry trays may be used in migrant labor camps either as a back up to mechanical washers or in lieu of mechanical washers. If a mechanical washer becomes inoperable, the machine can be removed and the hot and cold water can be hosed into the laundry tray. The waste water from the tray can be manually dumped into an approved waste water disposal system.

Background: Section of 654.412(d) of the *Code of Federal Regulations* (Bathing, laundry, and handwashing) states:

Laundry facilities, supplied with hot and cold water under pressure shall be provided for the use of all occupants. Laundry trays or tubs shall be provided in the ratio of 1 per 25 persons. Mechanical washers may be provided in the ratio of 1 per 50 persons in lieu of laundry trays, although a minimum of 1 laundry tray per 100 persons shall be provided in

addition to the mechanical washers.

Interpretation: A laundry tray is a self-contained open top container with a minimum capacity of five gallons that can be easily carried to allow for proper disposal of its contents. Laundry trays shall be constructed of lightweight, durable material and resistant to laundry detergents (heavy duty plastic is acceptable). It shall be made of smooth material and easily cleanable.

Where mechanical washers are not used, laundry trays shall be used in the ratio of one tray per 25 persons. Where mechanical washers are used, a minimum of one laundry tray shall be provided for each 100 persons. In either case, hot and cold water shall be provided and the waste water shall be disposed of in an approved disposal system.

Responsibility: The district Environmental Health Manager is responsible for assuring that all district migrant labor camp program staff understand and implement this interpretation.

Effective Date: April 1, 1997

Approved by:

Director
Division of Food and Environmental Services

Endorsed by:

Director
Office of Environmental Health Services